

a block of 10,000 numbers from the incumbent LEC²⁷ (or preferably an independent number administrator) to be assigned and have those numbers assigned to their customers. If the reseller either became spectrum license-based or moved to another underlying CMRS service provider, the entire block of numbers could move with it. This allows basic number transferability without opening the greater debate concerning true number portability.

The Sprint Venture enthusiastically supports the development of true and full number portability. True number portability should apply to all segments of the telecommunications market. Thus, the debate needs to include all classes of service providers. For purposes of protecting CMRS resellers as true number portability is developed, the transferability of blocks of 10,000 numbers should be adequate. The carrier that requests blocks of 10,000 numbers from the incumbent LEC and transfers those numbers should pay the costs associated with obtaining the numbers and with the transfer of the numbers between underlying carriers.

In the larger context of true number portability, the Sprint Venture supports rapid and decisive action by the Commission aimed at implementing in a timely fashion true number portability. Other than a lack of authorization to enter local markets, the lack of true number portability is one of the greatest market entry barriers that LECs raise in forestalling true local exchange competition. This barrier must fall quickly for consumers to reap the rewards of free and open competition. The Sprint Venture encourages the Commission to exert its leadership and decisively move the industry toward rapid deployment of true number portability.

²⁷ The Sprint Venture notes that LECs retain competitive advantages through their control of numbering resources. Special care must be exercised to ensure that LECs do not abuse their status in areas such as NPA splits and number allocations.

VI. CONCLUSION

The Sprint Venture urges the Commission to closely monitor the market power and actions of incumbent LEC affiliated CMRS carriers in regard to direct interconnection requests with other CMRS carriers. The Commission, for the most part, should rely upon market forces to drive rational CMRS to CMRS interconnection decisions. The Commission should continue resale policy for CMRS services, whether it be by arbitrage resellers or in the form of roaming arrangements. However, resale need not continue for "spectrum license-based" CMRS carriers after the expiration of the 10 year build out period in such licensed areas. There is no valid justification for requiring that CMRS retail services or network should be unbundled. Lacking market power, CMRS carriers should not be subjected to such an unreasonable and unjustified unbundling requirement.

Respectfully submitted,

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